

IN THE UNITED STATES DISTRICT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED

UNITED STATES OF AMERICA

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§  
§  
§  
§

CRIMINAL NO.

JAN 28 2010

v.

Clerk of Court

JAMES EARL DUNN, JR.

DEFENDANT

**H-10-40**

INDICTMENT

COUNT ONE

18 U.S.C. § 506 (a)(1)(2)

THE GRAND JURY CHARGES:

A. INTRODUCTION

At all times material to this indictment:

1. **James Earl Dunn, Jr.**, defendant herein, was a resident of Houston, Texas, and was President of Lamp Stand Institute ("LSI"), a non-profit organization that was a part of the outreach ministry of the Kingdom Building Fellowship Church located in Houston, Texas. LSI allegedly sponsored a Veteran's Housing Program at various locations in the Houston area to provide assisted housing for eligible veterans. **Dunn** created a false HUD Notice of Grant Award letter, using the HUD seal on the letter, indicating that LSI had received a HUD Veterans Affairs Supportive Housing ("HUD-VASH") grant in the amount of \$1,938,250.22. Further,

**Dunn** used the award letter to obtain money and property from individuals in the Houston area.

2. **United States Department of Housing and Urban Affairs**, (“HUD”), is a federal agency headquartered in Washington, DC, whose mission is to increase home ownership, support community development and increase access to affordable housing free from discrimination. To fulfill this mission, HUD embraces high standards of ethics, management and accountability and forges new partnerships- particularly with faith-based community organizations- that leverage resources and improve HUD’s ability to be effective on the community level. To that end, HUD provides funding to State and Local agencies to develop, renovate, and acquire housing under a myriad of programs.

On or about January 7, 2009, in Houston, Texas, in the Southern District of Texas, and elsewhere,

**James Earl Dunn, Jr.,**

the defendant herein, did knowingly make, forge, counterfeit, and alter a seal of an agency and department of the United States, that is, the Department of Housing and Urban Development, and, affix and impress a fraudulently made, forged, and altered seal and facsimile of the HUD seal to and upon a document and paper, that is, a “Notice of Grant Award” in the amount of approximately, \$1, 938, 250.22, for the purpose of obtaining money and property from individuals purportedly to assist

veterans with housing, when in truth and in fact, the Department of Housing and Urban Development did not make an award of funds.

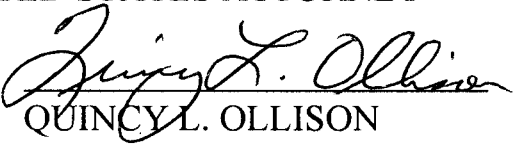
(All in violation of Title 18, United States Code, Section 506 (a)(1)(2)).

A TRUE BILL

ORIGINAL SIGNATURE ON FILE

Foreperson of the Grand Jury

TIM JOHNSON  
UNITED STATES ATTORNEY

By:   
QUINCY L. OLLISON  
Assistant United States Attorney